

# Exhibit 30

**From:** [Thomas Ricotta](#)  
**To:** [Michael R. Minkoff](#)  
**Subject:** Re: Defrancesco  
**Date:** Tuesday, April 2, 2019 4:54:15 PM  
**Attachments:** [image002.png](#)  
[image002.png](#)

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-Michael,

I don't have consent from her on that. I will let you know if that changes.

Sincerely,

Thomas Ricotta  
Ricotta & Marks, P.C.  
31-10 37th Avenue, Suite 401  
Long Island City, New York 11101  
(347) 464-8694 (phone)  
(800) 483-4508 (fax)  
[Tricotta@ricottaandmarks.com](mailto:Tricotta@ricottaandmarks.com)

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On Apr 2, 2019, at 4:36 PM, Michael R. Minkoff <[mrm@employmentlawyernewyork.com](mailto:mrm@employmentlawyernewyork.com)> wrote:

Tom:

I'm following up again on this issue. Please advise, as we need to prepare and submit our opposition.

Thank you.

Sincerely,

Michael R. Minkoff, Esq.  
Borrelli & Associates, P.L.L.C.  
Tel. No. (516) 248-5550  
Fax No. (516) 248-6027

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Tel. No. (212) 679-5000  
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**From:** Michael R. Minkoff  
**Sent:** Monday, March 18, 2019 9:56 AM  
**To:** 'tricotta@WRMAttorney.com' <[tricotta@WRMAttorney.com](mailto:tricotta@WRMAttorney.com)>  
**Cc:** 'tricotta@ricottaandmarks.com' <[tricotta@ricottaandmarks.com](mailto:tricotta@ricottaandmarks.com)>; 'tricotta@NewYorkStateEmploymentAttorney.com' <[tricotta@NewYorkStateEmploymentAttorney.com](mailto:tricotta@NewYorkStateEmploymentAttorney.com)>  
**Subject:** RE: Defrancesco

Tom:

I'm following up on this request. Please advise. If you'd prefer to wait to provide consent until after you've reached an agreement on the remaining issues with Defendant's counsel, let me know.

While our deadline to oppose is over a month away, we'd prefer to get our opposition in as soon as possible.

Thank you.

Sincerely,

Michael R. Minkoff, Esq.  
Borrelli & Associates, P.L.L.C.  
Tel. No. (516) 248-5550  
Fax No. (516) 248-6027

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**From:** Michael R. Minkoff  
**Sent:** Tuesday, March 12, 2019 5:35 PM  
**To:** 'tricotta@WRMAttorney.com' <tricotta@WRMAttorney.com>  
**Cc:** 'tricotta@ricottaandmarks.com' <tricotta@ricottaandmarks.com>; 'tricotta@NewYorkStateEmploymentAttorney.com' <tricotta@NewYorkStateEmploymentAttorney.com>  
**Subject:** Defrancesco

Dear Tom:

Per Judge Broderick's order, we are required to submit our opposition to Defendants' motion for sanctions. You should now be in receipt of our materials previously submitted under seal when we moved to withdraw, per the link I sent over when we last spoke. It is our position that - given Defendants' counsel's misrepresentations of the record here, as you and I previously discussed, it may be best for us to be able to submit our prior ex parte submission on the public docket. We are therefore requesting your consent to do so.

Please advise.

Thank you.

Sincerely,

Michael R. Minkoff, Esq.  
Borrelli & Associates, P.L.L.C.  
910 Franklin Avenue, Suite 200  
Garden City, New York 11530  
Tel. No. (516) 248-5550  
Fax No. (516) 248-6027

(\*\*\*Please note our new Long Island office address as of October 22, 2018 will be  
910 Franklin Avenue, Ste. 200, Garden City, NY 11530\*\*\*)

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<image001.jpg>



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